

June 22, 2023

The Honorable Sandra Thompson  
Federal Housing Finance Agency  
Washington, D.C.

Director Thompson,

Thank you for the opportunity to provide feedback on the Federal Housing Finance Agency (FHFA) Request for Information on tenant protections. My name is Hannah Jones and I am the Director of Development with the West Virginia Coalition to End Homelessness. Our agency provides assistance to individuals experiencing homelessness or who are at risk of homelessness in 44 counties of the mountain state. I am writing to urge FHFA to take bold action to create clear, strong, and enforceable renter protections for households living in rental properties with federally backed mortgages. Given the broad reach of FHFA's work, any renter protections created by FHFA should cover a significant share of renters across the nation and put America on a pathway towards stronger protections for all renters.

Federal renter protections are critically needed to address the power imbalance between landlords and renters that puts renters at greater risk of housing instability, harassment, and homelessness and fuels racial and gender inequity. To help ensure greater housing stability, FHFA should create new renter protections for households living in properties with federally backed mortgages, including:

1. **Source of income protections** to prohibit landlords from discriminating against households receiving rental housing assistance such as Section 8 Housing Choice Vouchers, or Supplemental Security Income (SSI), or local rental assistance, so that families can have greater choice about where to live.
  2. **“Just cause” eviction standards**, which limit the causes for which a landlord can evict a tenant or refuse to renew a tenant's lease when the tenant is not at fault or in violation of any law.
  3. **Rent gouging protections** to stop landlords from dramatically and unreasonably raising rents.
1. **Requirements to ensure housing is safe, decent, accessible, and healthy** for renters and their families.

I have seen what happens in communities without strong, enforceable tenant protections. Source of income protections alone would greatly change the rental landscape in West Virginia. Currently, landlords openly refuse to rent to tenants with vouchers or rental assistance. Rental advertisements around the state regularly use phrases like “no section 8, no HUD, no assistance of any kind”. This creates additional barriers on an already vulnerable population. Additionally, it creates a shortage of available housing in a limited market. Before a person can even apply for a unit the words in the listing essentially tell them “don't bother”. Protections against this blatant



discrimination are desperately needed. “Just cause” eviction standards and rent gouging protections are also critically important. The power dynamic between landlord and tenant far too often favors the landlord. We need to ensure that landlords are not abusing their power and dramatically increasing rent, or evicting without cause. Requirements to ensure that housing be safe, decent, accessible, and healthy should not only be implemented but enforced. The fair treatment of tenants and the upkeep of basic property maintenance should be the minimum standard.

We urge FHFA to take bold action to implement mandatory, standardized protections – paired with strong enforcement – for all households living in properties with federally backed mortgages, including larger developments and smaller properties. FHFA must continue to engage tenants and directly impacted people throughout its process of establishing and implementing renter protections, and protections must be centered on racial and social equity as explicit goals. These protections– along with to large-scale, sustained investments and an-racist reforms – are necessary to ensure that everyone, including the lowest-income and most marginalized renters, have a safe, quality, affordable, and accessible place to call home.

Sincerely,

Hannah Jones  
Development Director  
West Virginia Coalition to End Homelessness